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March 27, 2025

Barbara J. Parker
3159 Belgreen Road
Philadelphia, PA 19154

RE: **Notice of Default**
2019 Kia Sorento
Chapter 13 Case No. 22-13138

Dear Ms. Parker:

My firm represents PRA Receivables Management, LLC, servicing agent for Portfolio Recovery Associates, LLC, assignee of Consumer Portfolio Services, Inc. ("PRA"). PRA records reflect a default under the terms of the Stipulation Resolving Motion for Relief from Automatic Stay filed on June 12, 2023 due to failure to make all of the regular monthly contract payments of \$443.11 directly to PRA since the filing of the Stipulation. While the July 14, 2023 through March 14, 2025 monthly payments of \$443.11 each have come due since the Stipulation in the total amount of \$9,305.31, PRA's records reflect receiving only \$7,537.87 since the Stipulation. Accordingly, there exists a payment default under the Stipulation in the amount of \$1,767.44 (representing \$438.11 of the December 14, 2024 regular monthly contact payment and the full January 14, 2025 through March 14, 2025 regular monthly contract payments of \$443.11 each). PRA records reflect last receiving a payment from the Debtor on December 23, 2024. Please find enclosed a copy of the Stipulation and PRA's Post-Stipulation Default Calculation.

This Notice of Default is to notify you of this default and your opportunity to cure the default within ten (10) days from the date of this Notice of Default in accordance with the Stipulation. If the default is not cured at the end of the 10-day cure period, PRA may file a Certification of Default in your bankruptcy case seeking that the Court enter an Order granting relief from the automatic stay.

Sincerely,

Jacob Zweig

Enclosures

cc: Brad J. Sadek, Esq.
Sadek Law Offices, LLC
1500 John F. Kennedy Blvd., Suite 220
Philadelphia, PA 19102-1754
(Via US Mail and Email: brad@sadeklaw.com)



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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: BARBARA J. PARKER, Debtor, CONSUMER PORTFOLIO SERVICE, INC. Movant, v. BARBARA J. PARKER, and KENNETH E. WEST, Trustee. Respondents.	Bankruptcy No. 22-13138-mdc Chapter 13 Document No. 29, 34
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STIPULATION RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, Consumer Portfolio Services, Inc. ("Movant"), by and through its undersigned counsel, Bernstein-Burkley, P.C., and, Debtor, Barbara J. Parker, by and through her undersigned counsel, Brad J. Sadek, Esquire, and together file this Stipulation Resolving Motion for Relief from the Automatic Stay (the "Stipulation"), stating as follows:

1. The automatic stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.
2. Movant has a secured interest in the 2019 Kia Sorento Utility 4D LX, VIN# 5XYPG4A53KG558286 (the "Vehicle").
3. As of the date of this Stipulation, the Debtor is in default of her post-petition payment obligations to Movant in the amount of \$3,199.23.
4. Debtor will cure the remaining post-petition arrears by making monthly payments to Movant through an Amended Chapter 13 Plan to be filed by Debtor and her Counsel. In order to resolving the pending the Objection, the parties agree as follows:

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- a. Debtor shall have an Amended Chapter 13 Plan to provide for the \$3,199.23 in post-petition arrears.
- b. The terms of this Stipulation shall be incorporated into the Debtor's confirmed Chapter 13 plan and any subsequent plan filed thereafter.
- c. Consumer Portfolio Services, Inc. shall be paid outside the Debtor's Chapter 13 Plan.
- d. Any conversion or dismissal of this case shall void the terms of the stipulated order.

5. Debtor shall direct the payments to:

CPS Auto Rec Trust 2014-C
P.O. Box 514278
Los Angeles, CA 90051-4278

Payments must be received by Movant at the above-referenced address on or before the 1st day of each month. Debtor will be in default under the Stipulation in the event that the Debtor fails to comply with the payment terms and conditions in Paragraph 4, *supra*. If Debtor defaults under this Stipulation, Movant may send Debtor and Debtor's counsel a Notice of Default. Debtor will have ten (10) days from the date of the Notice of Default to cure the default. If default is not cured after the ten days, a Certification of Default will be immediately filed with the Court by the Movant.

6. In the event the instant bankruptcy case is converted to a case under Chapter 7 of the Bankruptcy Code, the Debtor shall cure the pre-petition and post-petition arrears within ten (10) days from the date of such conversion. Should Debtor fail to cure said arrears within the ten day period, such failure shall be deemed a default under the terms of this Stipulation. Movant may serve a notice of default and intent to file Certification of Default but Debtor will not be granted an opportunity to cure the default. Instead, a Certification of Default will be immediately filed with the Court.

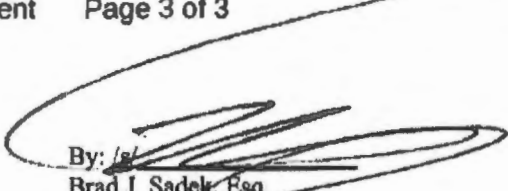
7. This Stipulation may only be modified by a revised Stipulation filed on the docket in the Bankruptcy. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence. No written modifications are permitted, except for a revised Stipulation filed on the docket in the Bankruptcy.

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Agreed to by:

By: /s/ Keri P. Ebeck
Keri P. Ebeck, Esq.
PA I.D. # 91298
kebeck@bernsteinlaw.com
601 Grant Street, 9th Floor
Pittsburgh, PA 15219
412-456-8112
Fax: (412) 456-8120

Counsel for Consumer Portfolio Services, Inc.


By: /s/ Brad J. Sadek
Brad J. Sadek, Esq.
PA I.D.# 90488
brad@sadeklaw.com
1500 JFK Boulevard, Ste 220
Philadelphia, PA 19102
215-545-0008
Fax : 215-545-0611

Counsel for Barbara J. Parker

Dated: June 8, 2023

PRA RECEIVABLES MANAGEMENT, LLC

Post-Stipulation Arrearage Calculation

<u>Due Date</u>	<u>Amount Due</u>	<u>Date Paid</u>	<u>Amount Paid</u>
7/14/2023	\$ 443.11	6/28/2023	\$ 443.11
8/14/2023	\$ 443.11	2/14/2024	\$ 443.11
9/14/2023	\$ 443.11	3/4/2024	\$ 443.11
10/14/2023	\$ 443.11	3/25/2024	\$ 443.11
11/14/2023	\$ 443.11	4/1/2024	\$ 443.11
12/14/2023	\$ 443.11	4/22/2024	\$ 443.11
1/14/2024	\$ 443.11	5/7/2024	\$ 443.11
2/14/2024	\$ 443.11	5/21/2024	\$ 443.11
3/14/2024	\$ 443.11	6/5/2024	\$ 444.11
4/14/2024	\$ 443.11	6/18/2024	\$ 444.11
5/14/2024	\$ 443.11	7/5/2024	\$ 444.11
6/14/2024	\$ 443.11	8/12/2024	\$ 444.11
7/14/2024	\$ 443.11	8/12/2024	\$ 444.11
8/14/2024	\$ 443.11	9/12/2024	\$ 443.11
9/14/2024	\$ 443.11	10/7/2024	\$ 443.11
10/14/2024	\$ 443.11	11/7/2024	\$ 443.11
11/14/2024	\$ 443.11	12/23/2024	\$ 443.11
12/14/2024	\$ 443.11	Total Paid	\$ 7,537.87
1/14/2025	\$ 443.11		
2/14/2025	\$ 443.11	Arrears	\$ 1,767.44
3/14/2025	\$ 443.11		
Total Due	\$ 9,305.31		

Jacob Zweig

From: Jacob Zweig
Sent: Thursday, March 27, 2025 9:16 AM
To: 'brad@sadeklaw.com'
Subject: Parker, Barbara (E.D.Pa. 22-13138)
Attachments: PRA Parker Notice of Default Signed.pdf

Mr. Sadek,

My firm represents PRA Receivables Management, LLC, servicing agent for Portfolio Recovery Associates, LLC, assignee of Consumer Portfolio Services, Inc., secured creditor regarding Ms. Parker's 2019 Kia Sorento. Please find attached PRA's Notice of Default pursuant to the parties' prior Stipulation Resolving Motion for Relief from Stay. Payments to PRA ceased in December. Please let me know if any questions or concerns.

Best regards,

Jacob Zweig
Evans Petree PC
(901) 271-0726